

March 31, 2021

**VIA ECF**

The Honorable John P. Cronan  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *Graciano v. Total Life Changes, LLC*; Case No. 1:20-cv-09262-JPC

Dear Judge Cronan:

We represent defendant Total Life Changes, LLC ("Defendant") in the above-referenced matter. Together with counsel for plaintiff, we jointly and respectfully move this Court to stay all case deadlines in this action for forty five (45) days, from March 31, 2021 to May 14, 2021.

This requested stay will permit the parties to finalize their efforts to bring about the voluntary dismissal of all claims asserted in this action without further litigation. Once those efforts are complete, the parties will file a stipulation of voluntary dismissal.

/s/ Timothy J. Straub  
Timothy J. Straub


cc: All counsel of record (by ECF)

All deadlines in this action are adjourned for forty five days. Defendant shall answer or otherwise respond to the Complaint by May 17, 2021. Motions for leave to amend or to join additional parties shall be filed by May 28, 2021. Fact discovery shall be completed by September 3, 2021, expert discovery shall be completed by October 18, 2021, and the joint status letter is due October 25, 2021.

The initial pretrial conference scheduled for April 5, 2021 at 10:00 a.m. is adjourned *sine die*.

SO ORDERED.

Date: March 31, 2021  
New York, New York

  
JOHN P. CRONAN  
United States District Judge